

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

vs.

BOZHIDAR LAZAROV

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Case No. SKG 11-3343

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MOTION TO REGARDING CONSENT TO DETENTION

The defendant, Bozhidar Lazarov, by and through his attorneys Nicholas J. Vitek, and Vitek Law LLC, hereby files this motion regarding Mr. Lazarov detention and for the reasons outlined below, respectfully requests that the Court cancel the detention hearing currently scheduled for Wednesday April 18, 2013 at 10:30 a.m.

1. Mr. Lazarov was arrested and had his initial appearance on April 11, 2013. At his initial appearance the government revealed that a detainer had been filed with the Immigration and Naturalization Service such that if Mr. Lazarov was released he would be detained by the immigration authorities.
2. On April 11, 2013, undersigned counsel sought a detention hearing so that the validity of Mr. Lazarov's immigration status could be established, and if his status was one that made him eligible for release, a detention hearing be held regarding his release. This detention hearing is currently scheduled for April 18, 2013.
3. Undersigned counsel has consulted with Mr. Lazarov, with the services of an interpreter, and if a hearing were held on April 18, 2013 he would merely consent to detention. Mr. Lazarov understands that by consenting to detention he has agreed to his detention and preserves the right to request a hearing without prejudice to set conditions of his release if he desires to do so in the future.

4. Given that if the hearing were to move forward the only event that would take place would be for Mr. Lazarov to merely consent to his detention, Mr. Lazarov respectfully requests that the detention hearing currently scheduled for April 18, 2013 be cancelled.

WHEREFORE, Mr. Lazarov respectfully requests that the detention hearing be cancelled without prejudice to his requesting a detention hearing at a later date.

Respectfully submitted,

_____/s/_____
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